

Exhibit A

Exhibit A

BURKE HUBER, ESQ.
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RICHARD HARRIS LAW FIRM
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Attorneys for Plaintiffs

**DISTRICT COURT
CARSON CITY COUNTY, NEVADA**

MARCI WELCH, an individual,

Plaintiff,

vs.

CHROMALLOY NEVADA, business entity
unknown; RAMON PERROT, an individual, an
individual, and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

CASE NO.: 21 TRT 000513
DEPT NO.: II

SUMMONS

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU
WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ
THE INFORMATION BELOW.**

TO THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against you for the
relief set forth in the Complaint.

CHROMALLOY NEVADA AND RAMON PERROT

1. If you intend to defend this lawsuit, within 21 days after this Summons is served on you
exclusive of the day of service, you must do the following:

(a) File with the Clerk of this Court, whose address is shown below, a formal written
response to the Complaint in accordance with the rules of the Court, with the appropriate
filing fee.

(b) Serve a copy of your response upon the attorney whose name and address is shown
below.

2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and
failure to so respond will result in a judgment of default against you for the relief demanded in the

1 Complaint, which could result in the taking of money or property or other relief requested in the
2 Complaint.

3 3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so
4 that your response may be filed on time.

5 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board
6 members, commission members and legislators each have 60 days after service of this Summons
7 within which to file an Answer or other responsive pleading to the Complaint

8 Submitted by:

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12 RICHARD HARRIS, ESQ.
Nevada Bar No. 505
BURKE HUBER, ESQ.
Nevada Bar No.: 10902
13 RICHARD HARRIS LAW FIRM
14 801 South Fourth Street
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15 Telephone: (702) 444-4444
16 Attorneys for Plaintiff

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By: DEPUTY CLERK

Date

march 3, 2021

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REC'D & FILED
2021 MAR -3 PM 1:44
AUDLEY ROULETT
CLERK
~~MS. BARAJAS~~

DISTRICT COURT

CARSON CITY COUNTY, NEVADA

MARCI WELCH, an individual,

Plaintiff,

vs.

CHROMALLOY NEVADA; business entity
unknown; RAMON PERROT, an individual, an
individual, and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

CASE NO.: 21 TRT 000151B
DEPT. NO.: II
COMPLAINT FOR DAMAGES FOR

1. Violation of Title VII and NRS §613.310/Sexual harassment
2. Intentional Infliction of Emotional Distress (IIED)
3. Battery
4. Negligent Hiring, Training, Supervision, Retention

COMES NOW, Plaintiff, Marci Welch, by and through her attorney, Burke Huber, Esq. of Richard Harris Law Firm and for the causes of action against Defendants alleges based upon information and relief as follows:

PARTIES AND JURISDICTION

1. At all times relevant, Marci Welch ("Plaintiff"), was a resident of Carson City County, Nevada and an employee of Chromalloy Nevada.

2. At all times relevant, Defendant Chromalloy Nevada ("Chromalloy") is an unknown entity doing business in Nevada and subject to the jurisdiction of Carson City

1 County, Nevada.

2 3. At all times relevant, Defendant Ramon Perrot ("Defendant Perrot") was a
3 resident of Carson City County, Nevada and a supervisor for Chromalloy.

5 4. At all times relevant, the true names and capacities whether individual,
6 corporate, associate, partnership or otherwise of the Defendant herein designated as DOES 1-
7 10, inclusive, are unknown to the Plaintiff who therefore sues said Defendants by such
8 fictitious names. The identities of Defendants DOES 11-20, and ROE CORPORATIONS 1-
9 20, are unknown at this time and may be individuals, corporations, associations, partnerships,
10 subsidiaries, holding companies, owners, predecessor or successor entities, joint venturers,
11 parent corporations or related business entities of Defendants, inclusive, who were acting on
12 behalf of or in concert with, or at the direction of Defendants and may be responsible for the
13 injurious activities of the other Defendants. Plaintiff requests leave of the Court to amend this
14 Complaint to specify the Doe Defendants when their identities become known. Plaintiff will
15 ask leave of this court to insert the true names and capacities of such Defendants when the
16 same have been ascertained and will further ask leave to join said Defendants in these
17 proceedings.

18 5. All the facts and circumstances that give rise to the subject lawsuit occurred in
19 Carson City County, Nevada.

20 **Violation of Discrimination in violation of Title VII and NRS §613.310**

21 **Gender Discrimination**

22 **Sexually Hostile Work Environment**

23 6. Plaintiff began her employment with Chromalloy on or around February 11,
24 2019,

25 7. During Plaintiff's employment with Chromalloy, Chromalloy's supervisor,
26 Defendant Perrot began making unwanted sexual advances towards Plaintiff.

27 8. Defendant Perrot would touch Plaintiff's buttocks and ask Plaintiff to send
28 naked pictures of herself to his phone.

9. Defendant Perrot also told Plaintiff that she wanted an increase in pay sex

1 would be required.

2 10. Plaintiff complained about Defendant Perrot's conduct but nothing was done
3 and it continued.

5 11. Defendant Perrot's sexual harassment only increased until the workplace
6 environment was so intolerably hostile that Plaintiff was forced to resign or in other words,
7 Plaintiff was constructively discharged.

8 **FIRST CAUSE OF ACTION**
9 **(Violation of Title VII and NRS § 613.310)**
10 **(By Plaintiff Against Defendants)**

11 12. Plaintiff realleges and incorporates by reference as though set forth in full
12 herein paragraphs 1 through 11 above.

13 13. Chromalloy and its supervisor, Defendant Perrot engaged in sexual harassment
14 and quid pro quo sexual harassment.

15 14. Defendants created a sexually hostile environment that resulted in Plaintiff's
16 suffering and eventual constructive termination.

17 15. Defendants' sexual harassment created an environment that was hostile towards
18 female employees and Plaintiff.

19 16. The sexually hostile work environment was severe and pervasive.

20 17. Plaintiff exhausted her administrative remedies prior to bringing suit and
21 received right to sue letters from the Equal Employment Opportunity Commission and Nevada
22 Equal Rights Commission.

23 18. As a direct and proximate result of these violations, Plaintiff has been damaged
24 in an amount in excess of \$15,000.00.

25 19. As a direct and proximate result of these violations, Plaintiff is entitled to
26 damages pursuant to statute, injunctive relief, punitive damages, attorney fees and costs.

27 20. Plaintiffs seek all damages and remedies allowed by law.

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SECOND CAUSE OF ACTION
(IIED)
(By Plaintiffs Against Defendants)

21. Plaintiff realleges and incorporates paragraphs 1 through 20 of the Complaint as though said paragraphs were fully set forth herein.

22. Defendant Perrot intentionally and deliberately touched Plaintiff without her consent or privilege.

23. Defendant Perrot intentionally and deliberately inflicted severe emotional distress upon Plaintiff.

24. As a direct and proximate result of these violations, Plaintiff suffered severe emotional distress and has been damaged in an amount in excess of \$15,000.00.

25. As a direct and proximate result Defendants' conduct, Plaintiff is entitled to compensatory and punitive damages.

26. Chromalloy knew or should have known about Defendant Perrot's conduct and did nothing to stop it.

27. Chromalloy is liable to Plaintiff via respondeat superior.

28. Plaintiff seeks compensatory and punitive damages and remedies allowed by law.

THIRD CAUSE OF ACTION
(Battery)
(By Plaintiff Against All Defendants)

29. Plaintiff realleges and incorporates paragraphs 1 through 28 of the Complaint as though said paragraphs were fully set forth herein.

30. During Plaintiff's employment, Defendant Perrot committed a battery upon Plaintiff.

31. Defendant Perrot intentionally touched Plaintiff in an offensive way without privilege or consent.

32. As a direct and proximate result of these violations, Plaintiffs are entitled to compensatory and punitive damages.

33. Chromalloy knew or should have known about Defendant Perrot's conduct and

1 did nothing to stop it.

2 34. Chromalloy is liable to Plaintiff via respondeat superior.

3 **FOURTH CAUSE OF ACTION**
4 **(Negligent Hiring/supervision/training/ retention)**
5 **(By Plaintiff Against Chromalloy)**

6 35. Plaintiff realleges and incorporates paragraphs 1 through 34 of the Complaint as
7 though said paragraphs were fully set forth herein.

8 36. During Plaintiff's employment, Chromalloy's supervisor, Defendant Perrot,
9 committed a sexual battery upon Plaintiff.

10 37. Defendant Perrot intentionally touched Plaintiff in an offensive way without
11 privilege or consent.

12 38. Chromalloy knew or should have known about Defendant Perrot's conduct and
13 did nothing to stop it.

14 39. Chromalloy failed to properly train, supervise and negligently retained
15 Defendant Perrot.

16 40. As a direct and proximate result, Plaintiff was harmed and seeks compensatory
17 and punitive damages in excess of \$15,000.

18 41. Chromalloy knew or should have known about Defendant Perrot's conduct and
19 did nothing to stop it.


20 **PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff prays judgment of this Court as follows:

- 22 1. General damages in an amount in excess of \$15,000.00;
- 23 2. Special damages in an amount in excess of \$15,000.00;
- 24 3. Injunctive relieve;
- 25 4. Punitive damages;
- 26 5. Treble Damages;
- 27 6. Attorney fees and cost of suit; and
- 28 7. For such other relief as is just and proper.

1 DATED this 22nd day of February 2021.

2 **RICHARD HARRIS LAW FIRM**

3 
5 BURKE HUBER ESQ.

6 Nevada Bar No. 10902

7 801 S. 4th Street

8 Las Vegas, NV 89101

9 *Attorneys for Plaintiff*

